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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☒ Affects Both Debtors
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company

Case No. 19-30088 (DM) (Lead Case)
Chapter 11
(Jointly Administered)

**DECLARATION OF ANDREW BEHLMANN
IN SUPPORT OF *EX PARTE* MOTION OF
SECURITIES LEAD PLAINTIFF PURSUANT
TO B.L.R. 9006-1 REQUESTING ORDER
SHORTENING TIME FOR HEARING ON
SECURITIES LEAD PLAINTIFF'S MOTION
TO STRIKE DECLARATION OF
CHRISTINA PULLO IN SUPPORT OF THE
DEBTORS' SUPPLEMENTAL BRIEF IN
RESPONSE TO THE COURT'S TENTATIVE
RULING REGARDING MOTION TO APPLY
RULE 7023 AND ORDER SETTING
DEADLINE [ECF NO. 5789]**

Related Document: Dkt. 5814

[No hearing requested]

I, Andrew D. Behlmann, Esq., hereby declare as follows, pursuant to 28 U.S.C. § 1746:

1. I am a Partner of the law firm of Lowenstein Sandler LLP, bankruptcy counsel in these chapter 11 cases of the above-captioned debtors in possession (the "**Debtors**") to Public

1 Employees Retirement Association of New Mexico, the court-appointed lead plaintiff (“**Lead**
2 **Plaintiff**”) in the securities class action styled as *In re PG&E Corporation Securities Litigation*,
3 Case No. 3:18-cv-03509-RS, the (“**Securities Litigation**”), pending in the United States District
4 Court for the Northern District of California.

5 2. I submit this Declaration in support of the *Ex Parte Motion of Securities Lead*
6 *Plaintiff Pursuant to B.L.R. 9006-1 Requesting Order Shortening Time for Hearing on Securities*
7 *Lead Plaintiff’s Motion to Strike Declaration of Christina Pullo in Support of the Debtors’*
8 *Supplemental Brief in Response to the Court’s Tentative Ruling Regarding Motion to Apply Rule*
9 *7023 and Order Setting Deadline [ECF No. 5789]* (the “**Motion to Shorten Time**”), filed
10 contemporaneously herewith.¹ Except as otherwise indicated herein, the facts set forth in this
11 Declaration are based upon my personal knowledge, information provided to me by Lead Plaintiff,
12 or based upon my knowledge and belief. I am authorized to submit this Declaration on behalf of
13 Lead Plaintiff.

14 3. In the Motion to Shorten Time, Lead Plaintiff requests that the Motion to Strike be
15 heard on an expedited basis at 1:30 p.m. (prevailing Pacific Time) on February 20, 2020, and that
16 any responses or objections to the Motion to Strike be in writing and filed with the Court and
17 served by 4:00 p.m. (prevailing Pacific Time) on February 19, 2020.

18 4. On February 17, 2020, a continued hearing was scheduled on the Court’s calendar
19 regarding the related Rule 7023 Motion for February 20, 2020 (the “**Continued Rule 7023**
20 **Hearing**”).

21 5. Prompt approval of the Motion to Strike is necessary to clarify the scope of the
22 factual record properly before the Court in advance of the Continued Rule 7023 Hearing and before
23 the Court renders a decision on the Rule 7023 Motion.

24 6. No previous request for the relief sought in the Motion to Shorten Time has been
25 made by Lead Plaintiff to this or any other court.

26 ¹ Capitalized terms used but not defined herein have the meanings given to them in the *Securities*
27 *Lead Plaintiff’s Motion to Strike Declaration of Christina Pullo in Support of the Debtors’*
28 *Supplemental Brief in Response to the Court’s Tentative Ruling Regarding Motion to Apply*
Rule 7023 and Order Setting Deadline [ECF No. 5789] (the “**Motion to Strike**”) or the Motion
to Shorten Time, as applicable.

1 7. The requested time modification will serve to maintain the current schedule for the
2 case.

3 8. At approximately 12:30 p.m. PST on the date hereof, I reached out to Debtors'
4 counsel, via email, requesting that the Debtors stipulate to the proposed shortened time. Given the
5 necessity that the Motion to Strike be resolved prior to or in conjunction with the Continued Rule
6 7023 Hearing, it was not feasible to further await a response from the Debtors' counsel or to seek
7 consent other from parties prior to the filing of the Motion to Shorten Time. However, cause exists
8 to hear the Motion to Strike on shortened time, as described therein, in the Motion to Shorten Time,
9 and in the related filings.

10 I declare under penalty of perjury that the foregoing statements made by me are true
11 and correct to the best of my knowledge, information, and belief, and I understand that I am subject
12 to punishment if any of the foregoing statements made by me are willfully false.

13
14 Dated: February 18, 2020

/s/ Andrew D. Behlmann
Andrew D. Behlmann, Esq.